

September 22, 2022

VIA ECF

Hon. Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Edelman v. NYU Langone Health System, et al.*
Case No. 1:21-cv-00502 (LGS)(GW)

Dear Judge Schofield:

We represent defendants NYU Langone Health System, NYU Langone Hospitals, and NYU Grossman School of Medicine, a Division of New York University f/k/a “NYU Hospitals Center” s/h/a “NYU Langone Medical Center,” “NYU Langone Nassau Rheumatology,” “NYU School of Medicine,” “NYU Grossman School of Medicine,” and “NYU Hospitals Center,” as well as individually named defendants Andrew T. Rubin, David Kaplan, Joseph Antonik and Joshua Swirnow (collectively, “Defendants”) in the above-referenced case. The parties write jointly concerning this Court’s Order dated September 14, 2022 (Dkt No. 152) (the “Order”).

Pursuant to Rule B.2 of Your Honor's Individual Rules and Procedures, we write to respectfully request an extension of the time to file a letter motion seeking to maintain sealed and/or redacted some or all of the documents referenced in the Order, from October 5, 2022 to and including October 19, 2022.

This is Defendants’ first request for an extension of time to file such letter motion. The request is necessitated because the letter motion is due on the Jewish high holiday of Yom Kippur, which will make Defendants’ counsel and certain Defendants unavailable. The foregoing is also true for September 26 and 27, the Jewish high Holiday of Rosh Hashanah. Additionally, these holidays begin on the night before the day of the Holiday, which will further limit counsel’s and certain Defendants’ availability. Thus, Defendants’ counsel will need additional time to review the records with Defendants.

Plaintiff consents to Defendants’ request, but wishes to address the Order as it relates to her. Plaintiff has not sought to seal any documents in this case. In fact, Plaintiff only made submissions with redactions in an effort to comply with prior requests to seal and/or Orders permitting same on Defendants’ motion, to which Plaintiff does not object. Plaintiff thus takes the opportunity to address this issue based on the Order, which notes that she also filed under seal excerpts from deposition transcripts as well as excerpts from contracts and did not file a motion to seal any of those materials. Because Plaintiff does not now seek – and has not previously sought – to seal any documents, she will not be filing any motion contemplated by the Order, and respectfully reiterates that any document submitted under seal in the past or going forward serves solely to comply with Defendants’ prior requests and/or any Orders concerning sealing.

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We thank the Court for its time and consideration.

Respectfully submitted,

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